

Danner, Ward

From: Jeng, Cy@DTSC <Cy.Jeng@dtsc.ca.gov>
Sent: Thursday, June 19, 2014 5:02 PM
To: Wilson, Patrick
Cc: Gillette, Maria@DTSC; Arano, Wendy@DTSC; Cota, Thomas@DTSC
Subject: Aroclor analysis

Hi Patrick,

Thank you for getting back to me quickly regarding EPA's decision to move forward with the Aroclor analysis in lieu of the congener analysis for PCBs in Steve's letter to the Malibu School District dated January 27, 2014. For the benefit of the DTSC project team, I've tried to summarize the rationale you provided for support of EPA's decision:

- EPA reviewed available PCB Aroclor analytical data collected from the site, and concluded that detected PCB compounds including congener ratios in the chromatograms for most samples match Aroclor 1254, and thus the Aroclor analysis is considered acceptable for making risk management and cleanup decisions.
- EPA also examined the congener data for air, surface and building materials collected by the District, and determined that all congener concentrations fall within acceptable risk ranges.

For the upcoming soil investigation in the PEA Work Plan, DTSC will direct the District to conduct Aroclor analysis plus 5% of the samples for congener analysis as we don't have any congener data for soil matrix to date. The congener samples will be collected from both campuses and cover the full range of PCB concentrations for comparison with those measured by Aroclor analysis. According to DTSC's PEA Guidance Manual, the risk evaluation will use total PCB concentrations from the Aroclor analysis and assume that all PCB compounds are equivalent to Aroclor 1254.

Please let me know if I didn't capture your conversation correctly or if you have any suggestions on the work proposed for PCBs in the PEA Workplan.

Thanks, CY

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